

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
Atlanta Division**

JENNIFER CHATTMAN,)
)
Plaintiff,)
)
v.) Civil Action No.
) 1:09-CV-1525-GET-ECS
ALPHA RECEIVABLES, INC.)
FREDERICK J. HANNA &) JURY TRIAL DEMANDED
ASSOCIATES, P.C.)
HSBC CARD SERVICES (III) INC.)
)
Defendants.)

**NOTICE TO TAKE DEPOSITION OF ALPHA RECEIVABLES, INC.
PURSUANT TO F.R.C.P. 30(b)(6)**

DATE: December 15, 2009

TO:

Scot Groghan, Esq.
Frederick J. Hanna & Associates, P.C.
1427 Roswell Road
Marietta, Georgia 30062

1. You are hereby notified that on the 11th day of January, 2010, beginning at 10:00 A.M. at the State Bar of Georgia, 104 Marietta Street, NW, I will take the deposition of Alpha Receivables, Inc., an organization in the form of a corporation upon oral examination by a responsible officer or officers designated by said organization pursuant to F.R.C.P. 30(b)(6), on the matters designated in

Exhibit “A” attached hereto. The items designated in **Exhibit “B”** hereto shall be produced by said responsible office or officers at said time and place in connection with said deposition as required by law and pursuant to F.R.C.P. 34. The deposition will be taken before an officer duly authorized by law to take depositions, will be recorded stenographically and/or by audio and/or video recording. The deposition will continue from day to day until its completion.

2. Under the provisions of F.R.C.P. 30(b)(6) the said corporation shall designate an agent or agents who will testify on the above corporation’s behalf as an agent of the corporation with regard to the matters set forth below, in Exhibit “A” hereto, and with respect to the items required to be produced in Exhibit “B” hereto.

3. Pursuant to F.R.C.P. 34, said agent or agents are hereby requested to produce at said deposition the documents set forth in Exhibit “B” hereto.

Daniel DeWoskin
Georgia Bar No. 220327
Attorney for Plaintiff

DeWoskin Law Firm, LLC
14 Lenox Pointe, NE
Atlanta, Georgia 30324
(404) 869-3565

**EXHIBIT "A" TO NOTICE OF PLAINTIFF TO TAKE DEPOSITION OF
DESIGNATED AGENT OF ALPHA RECEIVABLES, INC.**

MATTERS ON WHICH EXAMINATION IS REQUESTED

The matters upon which examination is requested are as follows:

- (1) The nature, source of, and identification, authentication of, and explanation of the terms of all documents previously produced and/or submitted by Alpha Receivables, Inc. in connection with:
 - (a) All pleadings, Discovery requests and responses propounded upon Alpha Receivables, Inc., and other documents filed in Dekalb County State Court Case No. 08A87534-5;
 - (b) Initial disclosure documents filed by Alpha Receivables, Inc. in the pending federal case filed by Plaintiff;
- (2) The nature, source of, and identification, authentication of, and explanation of the terms of documents required to be produced at said deposition pursuant to F.R.C.P. 30 and 34.

(3) Any documents filed with respect to the pending federal case against Alpha Receivables, Inc. filed by Plaintiff.

(4) The exact consideration paid by Alpha Receivables, Inc. for the acquisition of Plaintiff's alleged "account" on which Plaintiff based its claim in Dekalb County State Court Case No. 08A87534-5, to whom paid, and the date thereof.

(5) The business and business operations of Alpha Receivables, Inc., including but not limited to the nature of Alpha's business, the structure and organization of Alpha, the principal officers and/or executives of Alpha, and the location of Alpha's offices.

**EXHIBIT “B” TO NOTICE OF PLAINTIFF TO TAKE DEPOSITION OF
DESIGNATED AGENT OF ALPHA RECEIVABLES, INC.**

DOCUMENTS REQUIRED TO BE PRODUCED PURSUANT TO F.R.C.P.

30 AND 34

The deponent is requested to produce the following at deposition pursuant to F.R.C.P. 30 and 34:

- (1) Any and all documents upon which you intend to rely at trial, without regard to your method of reliance at trial.
- (2) The entire “**Accounts Sale Agreement**” by and between West Asset Management, Inc. as Seller and Alpha Receivables, Inc. as Buyer, dated as of January 30, 2008, referenced in the document captioned “Bill of Sale” attached as Exhibit “D” to Plaintiff’s Complaint.
- (4) Any and all documents, records, or other agreements referenced, relied on, and/or incorporated by reference in the said **Accounts Sale Agreement**.
- (5) Any and all records, agreements, and/or documents of any kind or nature, and recorded or stored in any form or format which are in the possession of

Plaintiff and which relate in any way to the account of Plaintiff, and/or the acquisition of the account of Plaintiff.

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CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1 (D), counsel hereby files with the Court this Certificate of Compliance. Plaintiff's documents were composed with Times New Roman 14-point font.

[SIGNATURE TO FOLLOW]

Respectfully submitted on 15th day of December, 2009

Counsel for Plaintiff:

/s/ Daniel Eliot DeWoskin
Daniel Eliot DeWoskin, Esq.
14 Lenox Pointe, NE
Atlanta, GA 30324

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CERTIFICATE OF SERVICE

I hereby certify that on this day I served a true and correct copy of the

PLAINTIFF'S NOTICE TO TAKE DEPOSITION OF ALPHA

RECEIVABLES, INC. upon the following counsel of record via electronic mail

to:

SCOT GROGHAN, ESQ.
Georgia Bar No.: 142250
Groghan.scot@hannalawoffice.com
1427 Roswell Road
Marietta, Georgia 30062

JAMES FREANEY, ESQ.
Georgia Bar No.: 274902
Freaney.james@hannalawoffice.com
1427 Roswell Road
Marietta, Georgia 30062

Respectfully submitted on 15th day of December, 2009.

[SIGNATURE TO FOLLOW]

Counsel for Plaintiff:

/s/ Daniel Eliot DeWoskin

Daniel Eliot DeWoskin, Esq.
14 Lenox Pointe, NE
Atlanta, GA 30324